

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE HONORABLE ANDRÉ BIROTTE JR., JUDGE PRESIDING

UM CORPORATION, a Japanese corporation,
Plaintiff and Counterdefendant,
vs.
TSUBURAYA PRODUCTIONS CO., LTD., a Japanese corporation,
Defendant and Counterclaimant.

No. CV 15-3764-AB-AJW

REPORTER'S TRANSCRIPT OF OPENING STATEMENT BY MR. CHIBIB

Los Angeles, California

Tuesday, November 7, 2017, 1:47 P.M.

Day 1 of Jury Trial, Page 1 through 24, Inclusive

PAT CUNEO CSR 1600, CRR-CM
Official Reporter
First Street Courthouse
350 W. First Street
Room 4311
Los Angeles, California 90012-4565
213-894-1782
patcuneo1600@gmail.com
www.patcuneo.com

1 APPEARANCES OF COUNSEL:

2 FOR PLAINTIFF AND COUNTERDEFENDANT:

3 PILLSBURY WINTHROP SHAW PITTMAN LLP
4 BY: MICHAEL CHIBIB
5 ATTORNEY AT LAW
6 401 Congress Avenue
7 Suite 1700
8 Austin, Texas 78701-3797
9 512-580-9609
10 michael.chibib@pillsburylaw.com

11 -and-

12 PILLSBURY WINTHROP SHAW PITTMAN LLP
13 BY: JEFFREY D. WEXLER, ATTORNEY AT LAW
14 AND TIMOTHY RAWSON, ATTORNEY AT LAW
15 725 South Figueroa Street
16 Suite 2800
17 Los Angeles, California 90017-5406
18 213-488-7100
19 jeffrey.wexler@pillsburylaw.com
20 tim.rawson@pillsburylaw.com

21 FOR DEFENDANT AND COUNTERCLAIMANT:

22 QUINN EMANUEL URQUHART & SULLIVAN, LLP
23 BY: JOHN B. QUINN, ATTORNEY AT LAW
24 AND RYAN S. GOLDSTEIN, ATTORNEY AT LAW
25 AND DANIEL C. POSNER, ATTORNEY AT LAW
AND ZACK A. SCHENKKAN, ATTORNEY AT LAW
865 South Figueroa Street
10th Floor
Los Angeles, California 90017-2543
213-443-3000
danposner@quinnemanuel.com
ryangoldstein@quinnemanuel.com
zackschenkkan@quinnemanuel.com

1 LOS ANGELES, CALIF.; TUESDAY, NOVEMBER 7, 2017; 4:29 P.M.

2 -000-

3 OPENING STATEMENT BY MR. CHIBIB

4 THE COURT: All right, Counsel, you may proceed.

5 MR. CHIBIB: Thank you, Your Honor.

6 Good afternoon. I know it's been a long day
7 already and I will try to be brief.

8 So you heard Mr. Quinn and you saw some very neat
9 videos and you saw a table display full of Ultraman toys and
10 things. There's no dispute here today that TPC created
11 Ultraman. They invested in it, they made films, they made
12 TV series.

13 This is a case about a contract. This is a
14 case -- it's a classic case of buyer's remorse or, more
15 specifically, seller's remorse.

16 We've all heard stories about someone who owned
17 something and they sold it maybe during desperate times only
18 for that thing to later become much more valuable and for
19 them to regret it.

20 You may have heard the story of Ronald Wayne who
21 was one of the founders of Apple Computers; and Mr. Wayne
22 sold his 10 percent stock of Apple back in 1976 for \$800.

23 I think you can imagine the lengths that Mr. Wayne
24 would go to unwind that deal if he could.

25 The evidence is going to show you in this case

1 that similar to Mr. Wayne that TPC was in serious financial
2 trouble back in the early to mid-1970s.

3 And they made an agreement with Mr. Sompote to
4 unwind -- I'm sorry -- they made an agreement with
5 Mr. Sompote to forgive his debt, the debt that TPC owed to
6 Mr. Sompote in exchange for this contract and the rights
7 that are shown in this contract and now TPC is going to all
8 these lengths to unwind this deal.

9 (An exhibit was displayed on the screen.)

10 MR. CHIBIB: This case is about the rights to
11 those films that are listed there in Section 1 of
12 Exhibit 4A.

13 You'll hear this contract also referred to as the
14 '76 agreement or '76 document but we're all talking about
15 the same agreement here; and the question that you are going
16 to be asked to resolve is: Is this agreement authentic? Is
17 it genuine?

18 We intend to show you convincing evidence that it
19 is. We're going to show you evidence that when times are
20 really tough in the 1976s that TPC made a desperate deal.
21 They traded their overseas rights to Ultraman in exchange
22 for about \$400,000 in forgiveness of debt which at that time
23 in 1976 was an enormous amount of money.

24 The contract has been the subject, as you heard
25 from Mr. Quinn, it's been the subject of litigation for over

1 20 years; and you're going to hear testimony from some of
2 that previous litigation in this case.

3 But what the evidence is also going to show is
4 that this contract was made by two very good friends.

5 (A photograph was displayed on the screen.)

6 MR. CHIBIB: Mr. Noboru Tsuburaya shown there in
7 the middle and Mr. Sompote Saengduenchai shown there on the
8 right. Mr. Noboru, as you heard, passed away back in 1995.

9 Mr. Sompote is still alive and living in Thailand,
10 and then you're going to hear testimony, previous testimony
11 that Mr. Sompote gave in other litigation proceedings. Both
12 parties are going to rely on Mr. Sompote's testimony from
13 those previous cases.

14 And while Mr. Quinn made a big deal about
15 Mr. Sompote not being here and the reasons he's not here,
16 you will hear testimony from his son Pete Saengduenchai that
17 Mr. Sompote is old, frail, and not able to travel.

18 Now you heard that TPC was founded by Mr. Kazuo's
19 grandfather Eiji Tsuburaya. Well, Eiji Tsuburaya was indeed
20 a very famous special effects director and filmmaker; and as
21 you heard also, he's one of the creators of Godzilla.

22 (A photograph was displayed on the screen.)

23 MR. CHIBIB: Mr. Eiji is shown here on the left of
24 the photo here with Mr. Sompote in the middle between King
25 Kong and Godzilla.

1 You'll hear testimony that Mr. Sompote studied
2 under Eiji Tsuburaya back in the early 1960s and Mr. Sompote
3 thought so much of Eiji Tsuburaya he considered him his
4 mentor or sensei and that Mr. Sompote became very, very
5 close with the Tsuburaya family.

6 You'll hear also that Mr. Sompote became quite
7 famous in his own right and successful making films, similar
8 monster-type films in Thailand; and he made those films
9 based on the things that he learned studying under Mr. Eiji.

10 (A photograph was displayed on the screen.)

11 MR. CHIBIB: You'll hear testimony that this is
12 Mr. Sompote there on the right consulting with
13 Mr. Eiji Tsuburaya for one of Mr. Sompote's most famous
14 films called "Crocodile."

15 You'll also see evidence that Mr. Sompote made
16 other films. One such is called "Giant v. Jambo 'A'" and he
17 made that movie with TPC. He made it with them in a close
18 relationship.

19 And through his relationship with Eiji Tsuburaya,
20 Mr. Sompote also became very, very close with his son
21 Mr. Noboru Tsuburaya; and you're going to hear Mr. Noboru is
22 of course the man who signed the 1976 agreement.

23 And you're going to see evidence and hear
24 testimony just how close Mr. Sompote was with the Tsuburaya
25 family. You'll hear that Mr. Sompote's son Pete is going to

1 testify that Mr. Noboru would visit them in Thailand and
2 would actually attend the movie sets of Mr. Sompote.

3 (A photograph was displayed on the screen.)

4 MR. CHIBIB: Pete's also going to tell you that
5 Mr. Noboru would actually stay at Sompote's house, their
6 family's house in Thailand when he came to visit and that he
7 attended the premier of Mr. Sompote's movie "Hanuman and the
8 Seven Ultraman"; and you'll hear testimony that that's
9 Mr. Noboru right there in the middle holding a young Pete on
10 his shoulders.

11 Next, to set the scene for what was going on in
12 1976 -- this is when the contract was made -- you'll hear
13 evidence from several witnesses and you'll see documents
14 that show a significant financial problem for TPC in the
15 mid-1970s.

16 They were suffering heavy losses from the downturn
17 in the Japanese economy, the high cost of producing the
18 live-action TV shows that they were known for, and there was
19 a decline in viewership of the monster movies or monster TV
20 shows that they were making as well.

21 You're going to hear testimony from TPC's own
22 witnesses and see their own documents that their revenues
23 were in very steep decline.

24 The evidence is also going to show that their
25 losses were mounting during this time; and maybe, most

1 notably, you're going to get to see evidence from the
2 autobiography of Noboru Tsuburaya.

3 And in that autobiography he's going to tell you
4 that the losses were so great and the debt was so big that
5 he contemplated suicide. This was in 1975 right before this
6 agreement was signed.

7 Remember \$400,000 back in 1976 is about the
8 equivalent of 120 million Japanese yen.

9 So it's in light of these circumstances that
10 you'll hear Mr. Noboru turned to his longtime friend from
11 Thailand Mr. Sompote.

12 You'll see documents and you'll hear testimony
13 from Mr. Sompote that over the next few years Mr. Noboru and
14 TPC received a tremendous amount of money from Mr. Sompote
15 to help save TPC.

16 First, the documents are going to show that
17 Mr. Sompote gave TPC business. He asked them to make films
18 and then he licensed back those films to TPC so they could
19 use them in Japan; and that was over \$100,000 worth of
20 license rights.

21 Second, you'll hear that Mr. Sompote also loaned
22 TPC over \$120,000 and that was from the proceeds of
23 Mr. Sompote selling his own films.

24 And, third, you're going to hear from Mr. Sompote
25 that in addition to that, that Mr. Noboru simply took over

1 \$100,000 from Mr. Sompote for selling Mr. Sompote's films
2 without Mr. Sompote's permission.

3 All told, the documents and the testimony is going
4 to show that it was almost \$400,000 that TPC had of
5 Mr. Sompote's money.

6 The evidence is also going to show that at that
7 time TPC could not pay back its debts. So they owed this
8 money and they didn't have the money to pay it back.

9 And Mr. Sompote is going to testify that
10 Mr. Noboru did the only thing he could at the time. He got
11 Mr. Sompote to forgive the debt in exchange for the rights
12 granted in the 1976 agreement.

13 And to confirm that fact, you're going to hear
14 testimony from Daisuke Oto. Now, let me tell you who
15 Mr. Oto is. Mr. Oto used to work for TPC. Not only did he
16 work for them, but he was on their Board of Directors.

17 Mr. Oto is going to tell you that Mr. Noboru told
18 him that his friend from Thailand gave him a lot of money
19 and saved TPC from bankruptcy; and Mr. Oto is also going to
20 tell you that Mr. Noboru told him that his friend from
21 Thailand could use Ultraman.

22 Now, let's talk a little bit about the
23 1976 agreement. It's a one-page document. We're going to
24 show you evidence that will prove that this is authentic.

25 You'll hear testimony and see a lot documents that

1 this contract is written on authentic Tsuburaya Enterprises
2 letterhead.

3 And you're going to hear testimony and see
4 evidence that this hanko seal is the official corporate
5 hanko seal for Tsuburaya Enterprises as well and that the
6 signature at the bottom of the page right by the hanko seal
7 is the signature of Mr. Noboru Tsuburaya.

8 To help with that, you're going to hear testimony
9 from Mr. Takashi Ejiri. Mr. Ejiri is an expert on Japanese
10 law and business customs.

11 Mr. Ejiri has been practicing law for almost 50
12 years and he received a law degree in Tokyo and also from
13 Harvard.

14 Mr. Ejiri was the senior partner at the largest
15 law firm in Japan. He was practicing corporate law in 1976
16 when this deal was made and he's going to tell you all about
17 what hanko seals mean, what they mean on contracts in Japan,
18 and what were the customs surrounding the use of hanko seals
19 back in Japan back in the mid-'70s.

20 He's also going to tell you that Japanese
21 companies, as you would imagine, kept those hanko seals very
22 secure.

23 You're going to hear TPC's own witnesses say that
24 they in fact kept their hanko seals very secure back in the
25 mid-'70s as well; and TPC offers no expert testimony to

1 rebut what you're going to hear from Mr. Ejiri.

2 Mr. Sompote is going to testify -- and you'll hear
3 his former testimony -- that he traveled to Japan and he
4 traveled to the offices of Tsuburaya on March 4th of 1976
5 and that that was where this contract was entered into.

6 (An exhibit was displayed on the screen.)

7 MR. CHIBIB: You heard a lot from Mr. Quinn
8 calling this agreement a photocopy, or a piece of photocopy
9 paper. Well, what you're looking at there is Exhibit 369
10 which was a photograph taken of the original 1976 agreement
11 as it was used in the foreign proceedings in Thailand.

12 There is an original contract. We don't have it.
13 But there is an original contract. So make no mistake,
14 Mr. Sompote didn't provide a photocopy piece of paper and
15 not have the original. He had the original and you'll hear
16 testimony about that.

17 Now, you'll also hear testimony from
18 Mr. Moriaki Uematsu. Mr. Uematsu is here in the courtroom
19 today and he's going to testify that he knew about this
20 agreement shortly after it was signed back in 1976.

21 You're also going to hear testimony from
22 Mr. Uematsu that he went to Thailand and visited Mr. Sompote
23 and there while visiting in 1989 he saw the original
24 1976 agreement.

25 You're also going to hear from Pete and Pete's

1 going to testify that when he was a boy he held the original
2 1976 agreement at his father's house in Thailand.

3 So you heard a little bit from Mr. Quinn and I
4 think we should talk about what exactly are they saying is
5 wrong with this contract. Why are they claiming this thing
6 to be invalid?

7 You'll hear that they think it's fake because
8 Mr. Noboru would never agree to these terms.

9 Well, none of that testimony is going to
10 acknowledge the severe financial problems that they were in
11 at the time.

12 You'll hear that they say that the signature is
13 forged but they not only claim that the signature is forged
14 on this document, they're also claiming that there was a
15 bunch of other forgeries too.

16 They'll have you believe that Mr. Sompote was the
17 mastermind of some elaborate forgery scheme.

18 And their witnesses, TPC's witnesses, are going to
19 say that either Mr. Sompote forged the letterhead and the
20 hanko seal and the signature or -- wait for this -- or that
21 he actually stole a piece of official Tsuburaya Enterprise
22 letterhead but not just any letterhead. Letterhead that was
23 already stamped with the very securely kept hanko seal.

24 It's as if Mr. Sompote got his hands on a blank
25 check that was already signed just laying around in the

1 office. That's what they're saying. That's why they say
2 that this is fake as implausible as that may be.

3 Our evidence is going to show that Exhibit 4A is
4 on official authentic Tsuburaya Enterprises letterhead and
5 not only any letterhead but the letterhead that was
6 specifically in use for a short period of time between 1973
7 and 1977, perfectly timed with this agreement.

8 You're also going to see these other documents
9 with Mr. Noboru's signature that look a lot like the
10 signature there on Exhibit 4A, the 1976 agreement.

11 But you're going to hear that TPC's witness,
12 because these signatures look like the '76 agreement, they
13 claim these are a forgery too. Easy.

14 (The exhibit was displayed on the screen.)

15 MR. CHIBIB: The first such document you're going
16 to get to see is Exhibit 129. 129 is a contract between
17 Tsuburaya Productions, TPC, and Mr. Sompote's company called
18 Thai Burin Film Company.

19 They claim this is a forgery even though the
20 evidence is going to show that TPC actually submitted this
21 document, Exhibit 129. They provided this to the Thai
22 authorities as an authentic agreement and now they're
23 claiming that it's a forgery.

24 (Photograph were displayed on the screen.)

25 MR. CHIBIB: The second document and the third

1 document that you're going to see are autographs of
2 Mr. Noboru Tsuburaya on these photographs. Here Exhibit 312
3 and similarly on Exhibit 313.

4 But they're going to claim -- TPC is going to
5 claim that these also are a forgery. So they want you to
6 believe on the one hand that Mr. Sompote is capable of
7 forging autographs on photos, contracts, hanko seals,
8 letterhead.

9 But then also, as you heard Mr. Quinn say, this is
10 the same guy who makes the bumbling mistakes of getting the
11 number of episodes wrong or the title of a film wrong.

12 It really doesn't weigh out. You really can't
13 make those both work together.

14 We are going to provide testimony from
15 Mike Wakshull. Expert testimony from Mike Wakshull.

16 Mr. Wakshull has a graduate certificate from the
17 Graduate School of Criminal Justice from East Tennessee
18 State. He's a certified quality engineer by the American
19 Society for Quality. He's a member of the National
20 Association of Document Examiners and he's testified several
21 times throughout courts in California and the rest of the
22 United States.

23 You do get to decide whether Mr. Wakshull is
24 qualified or not. You're going to hear his testimony and
25 you're going to hear how much experience he has and how much

1 education he has and you'll get to make that decision.

2 Mr. Wakshull is going to testify that the
3 letterhead of Exhibit 4A is authentic Tsuburaya letterhead
4 as of 1976.

5 He's going to testify that the hanko seal is the
6 authentic hanko seal for Tsuburaya Enterprises; and he's
7 also going to testify that the signatures that he was
8 provided allow for the conclusion that Mr. Noboru Tsuburaya
9 signed Exhibit 4A, the 1976 agreement.

10 And TPC is going to offer no expert testimony to
11 rebut Mr. Wakshull's opinion on the letterhead or the hanko
12 seal. The only expert testimony they offer is on the
13 signature.

14 As you heard from Mr. Quinn, TPC intends to rely
15 on the testimony of Lloyd Cunningham, the deposition
16 testimony. Potentially he'll be here in the courtroom.

17 And Mr. Cunningham -- you heard Mr. Quinn say that
18 Mr. Wakshull backed off of some opinions that he made
19 earlier because he realized maybe they were mistakes.

20 Well, Mr. Cunningham is the exact opposite.
21 Mr. Cunningham is going to tell you that it is impossible
22 for the person who signed the signatures that he reviewed to
23 be the same person that signed the 1976 agreement.

24 And he's going to tell you that it's impossible
25 that the person who signed the signatures that he looked at

1 is also the person who signed the photographs and the
2 contract that I showed you, those other three documents.

3 But what he's also going to have to testify,
4 Mr. Cunningham is going to have to tell you that he only
5 looked at 29 signatures. That's how many samples he looked
6 at in order to make his impossible conclusion.

7 You're going to hear testimony from TPC's own
8 employee, a gentleman by the name of Jimmy Ugawa who has
9 passed away so you're going to hear his deposition
10 testimony; that in the late 1990s that there were literally
11 thousands of documents with the signatures of
12 Noboru Tsuburaya on them and that Mr. Ugawa chose to provide
13 ten of them for examination.

14 Now you heard some reference to some of the
15 mistakes in the document; and the implication that Mr. Quinn
16 tried to get you to draw is that these mistakes make it less
17 likely that Mr. Noboru actually created and entered into
18 this document.

19 Well, the evidence is going to show, first of all,
20 that these were two men, one from Thailand, one from Japan,
21 neither of whom could speak English very well or write
22 English very well who chose to enter into a contract in
23 English. So let's start there.

24 And then secondly, you're going to hear testimony
25 that the documents are going to show you that these mistakes

1 are mistakes that coincide with TPC's usage of these terms
2 and this terminology or Mr. Noboru's mistakes. So these
3 mistakes actually make it more likely that Mr. Noboru made
4 this contract than less likely.

5 For example -- sorry. For example, you'll see in
6 1.1 there the title "Giant v. Jambo 'A'" in referencing a
7 contract in 1974. Well, "Giant v. Jambo 'A'" is terminology
8 that TPC uses, not Mr. Sompote.

9 You'll see documents that demonstrate the title
10 "Haruman and the Seven Ultraman" in Section 1.2, also
11 referring to a contract; and you'll hear that Mr. Sompote
12 was from Thailand.

13 The actual title of this should be "Hanuman."
14 It's an "N" not an "R." Hanuman is a Thai character, a
15 famous character from Thailand. Mr. Sompote knew who
16 Hanuman was. He actually made a movie with Hanuman.

17 So this Haruman or Hanuman you'll see is a common
18 mistake made by other countries in Asia, not people from
19 Thailand, so again making it more likely that Mr. Noboru
20 created this contract.

21 And then you're going to hear testimony from
22 Mr. Oto again, remember the former member of the Board of
23 Directors of TPC; and Mr. Oto is going to say that
24 Mr. Noboru oftentimes confused the name "Ultraman Seven"
25 with "Ultra Seven."

1 So again, the mistakes don't make it less likely.
2 They make it more likely that Mr. Noboru entered into this
3 agreement.

4 You also heard about the name of the company and
5 Mr. Quinn said that Mr. Noboru would never enter into a
6 contract where he didn't know the name of his company. But
7 that's not what's happening here.

8 So we're talking about the phase "Tsuburaya Prod.
9 and Enterprise Co., Ltd." You're going to hear testimony
10 from Mr. Sompote this was done in order to refer to both of
11 the entities. There are two Tsuburaya entities. There is
12 Tsuburaya Productions and there's Tsuburaya Enterprises and
13 that in order to make this document legally significant and
14 make it work, they had to get both entities into the
15 contract.

16 And Mr. Sompote will provide testimony that this
17 was done before the signature was made but after the
18 original document was typed and so they had to squeeze it
19 in. They didn't have room.

20 Remember in 1976 we're not using word processors.
21 We're using a typewriter. And so they typed in "Prod. and"
22 in two spots before they signed this contract and you're
23 going to hear testimony about that.

24 And I think maybe the most glaring thing that you
25 heard earlier is that there's no way Mr. Sompote could have

1 had these rights because he didn't do anything to exercise
2 those rights for 20 years between 1976 and 1996.

3 Well, the evidence is going to show you quite the
4 opposite. First, you're going to hear testimony from
5 Mr. Sompote that he built an entire movie studio. He spent
6 millions of his own money to create the studio to make
7 Ultraman movies.

8 Second, you're going to hear that he made an
9 Ultraman movie right here, "Hanuman and the Eleven
10 Ultraman."

11 (The exhibit was displayed on the screen.)

12 MR. CHIBIB: Mr. Quinn said there's no documents
13 evidencing what Mr. Sompote did during this time. Here's a
14 poster for the movie in Thailand, and he released that movie
15 in Thailand and he also, in 1984, released that movie
16 internationally and in the United States as the name "Space
17 Warriors 2000." It's the same film.

18 You'll see evidence that Mr. Noboru actually
19 provided the negatives to Mr. Sompote so he can make this
20 film in 1984, the negatives from the "Ultraman Zoffy" film
21 that you saw.

22 You're going to hear from USC film professor
23 Norman Hollyn. He's going to come testify and he's going to
24 tell you that indeed "Space Warriors 2000" that Mr. Sompote
25 made came from 45 minutes of footage from "Ultraman Zoffy"

1 along with footage from "Hanuman and the Seven Ultraman."

2 You're going to see TV Guide listings that show
3 that this movie "Space Warriors 2000" was shown in the U.S.
4 between 1985 and 1993.

5 Maybe more importantly, you're going to see a
6 document that was filed with the United States Copyright
7 Office back in 1985.

8 And this document is related to the distribution
9 rights of "Space Warriors 2000" and it was filed in the
10 federal government at the U.S. Copyright Office in 1984.

11 Again, Mr. Sompote wasn't doing nothing during
12 this period. You're going to hear testimony from Pete also
13 that Mr. Sompote was licensing the Ultraman TV series to
14 television stations in Thailand as well during this time
15 period.

16 And then you're going to get to watch a fantastic
17 music video that is by a famous Thai pop singer where
18 Mr. Sompote licensed the rights to this Ultraman character
19 for the use in the music video and this happened in 1992.
20 Again, right within the same time period that Mr. Quinn was
21 saying we did nothing; that Mr. Sompote did nothing. He did
22 many, many things.

23 Now, not long after this video in 1995, you're
24 going to hear testimony that Mr. Sompote saw that a company
25 in Thailand was selling and distributing Ultraman works that

1 are there in the 1976 agreement.

2 And that makes sense because Mr. Sompote lived in
3 Thailand. He worked in Thailand. He wasn't a man of
4 enormous means such that he would be internationally out
5 there looking for Ultraman distribution by TPC.

6 It was in his backyard. He saw it and he
7 approached that Thai company and he said: I have these
8 rights. You don't have these rights. You need to stop.

9 And then he went in 1995-'96, to TPC and he
10 presented this document. He said: I have these rights.
11 You need to tell them to stop or I'm going to sue them.

12 And you heard Mr. Quinn say that no one at TPC
13 knew about the 1976 agreement all the way until 1996. No
14 one knew about it.

15 Well, you're going to hear testimony from
16 Mr. Kiyoshi Suzuki. Mr. Suzuki is also a former employee of
17 TPC and he was there from the beginning. He worked with
18 Eiji Tsuburaya.

19 And Mr. Suzuki is going to tell you that in 1991
20 Jimmy Ugawa, again the head of the international division of
21 TPC, told him that TPC did not own the overseas rights to
22 Ultraman. In 1991, well before Mr. Sompote came to TPC with
23 the document.

24 You're going to hear from Mr. Kazuo Tsuburaya here
25 at the table and he was the president at that time in 1996.

1 And as Mr. Quinn said, he's Mr. Noboru's son and he's
2 Mr. Eiji's grandson.

3 (The exhibit was displayed on the screen.)

4 MR. CHIBIB: You're going to see a lot of
5 Exhibit 144, this 1996 letter that Mr. Kazuo wrote and
6 signed on behalf of TPC.

7 And this letter isn't just any letter. This
8 letter is going to show you that the contract, the 1976
9 contract was indeed legitimate and that Mr. Sompote did
10 indeed have those rights.

11 Just look what it says there in that first
12 paragraph. "This letter is to clarify that you have the
13 exclusive rights to exploit certain properties including
14 Ultraman series and Jamborg A series in the territories that
15 include Thailand and in all media that include home video
16 and for indefinite period" -- and here's important --
17 "pursuant to license granting agreement executed on
18 March 4th, 1976, between Tsuburaya Enterprise and
19 Mr. Sompote Saengduenchai."

20 They wrote this letter. They signed this letter.
21 Not only that, they got Mr. Sompote to not sue that other
22 Thai company that was selling those works.

23 You're also going to hear from Pete that TPC
24 intended Mr. Sompote to show this letter -- 144 -- to other
25 people in Thailand so that Mr. Sompote could reclaim his

1 reputation.

2 They wrote this letter. They signed the letter.
3 They said: Go tell people about it. And now you're going
4 to hear TPC's witnesses say: That's not true. Sorry.
5 We've reneged.

6 Let me conclude -- let me sum up and end your day
7 today.

8 We intend to show you considerable evidence that
9 this agreement is authentic. We intend to show you that
10 this is a classic case of buyer's remorse and that TPC just
11 wants to unwind this deal.

12 We intend to show you three things about this
13 contract.

14 First, that Mr. Sompote was in Japan on March 4th,
15 1976, at TPC's offices to make that contract.

16 That the document is on authentic Tsuburaya
17 letterhead and that the hanko seal is the authentic
18 Tsuburaya hanko seal and also that the signature is not a
19 forgery.

20 We're going to show you that TPC was desperate.
21 They were having really tough financial times back in the
22 early to mid-'70s.

23 And we're going to show you evidence that TPC
24 confirmed the validity of the 1976 agreement by writing
25 their apology letter in 1996.

1 Thank you very much again for your time today. I
2 appreciate it.

3 THE COURT: All right. Thank you, Counsel.

4 (End of requested proceedings.)

5
6 -o0o-

7
8 CERTIFICATE

9
10 I, PAT CUNEO, CSR 1600, hereby certify that
11 pursuant to Section 753, Title 28, United States Code, the
12 foregoing is a true and correct transcript of the
13 stenographically reported proceedings held in the
14 above-entitled matter and that the transcript page format is
15 in conformance with the regulations of the Judicial
16 Conference of the United States.

17
18 Date: November 8, 2017

19
20
21
22
23 _____
 /s/ PAT CUNEO

24 PAT CUNEO, OFFICIAL REPORTER
25 CSR NO. 1600

MR. CHIBIB: [11] 3/4 4/9 5/5 5/22
6/10 7/3 11/6 13/14 13/24 19/11 22/3
THE COURT: [2] 3/3 24/2

\$

\$100,000 [2] 8/19 9/1
\$120,000 [1] 8/22
\$400,000 [3] 4/22 8/7 9/4
\$800 [1] 3/22

,

'70s [3] 10/19 10/25 23/22
'76 [3] 4/14 4/14 13/12
'96 [1] 21/9
'A' [3] 6/16 17/6 17/7

-

-and [1] 2/7
-oOo [2] 3/2 24/6

/

/s [1] 24/23

1

1.1 [1] 17/6
1.2 [1] 17/10
10 [1] 3/22
10th [1] 2/17
120 million [1] 8/8
129 [3] 13/16 13/16 13/21
144 [2] 22/5 22/24
15-3764-AB-AJW [1] 1/9
1600 [3] 1/21 24/10 24/24
1700 [1] 2/5
1782 [1] 1/24
1960s [1] 6/2
1970s [2] 4/2 7/15
1973 [1] 13/6
1974 [1] 17/7
1975 [1] 8/5
1976 [14] 3/22 4/23 6/22 7/12 8/7
10/15 11/4 11/20 15/4 18/20 19/2 22/8
22/18 23/15
1976 agreement [11] 9/12 9/23 11/10
11/24 12/2 13/10 15/9 15/23 21/1
21/13 23/24
1976s [1] 4/20
1977 [1] 13/7
1984 [3] 19/15 19/20 20/10
1985 [2] 20/4 20/7
1989 [1] 11/23
1990s [1] 16/10
1991 [2] 21/19 21/22
1992 [1] 20/19
1993 [1] 20/4
1995 [2] 5/8 20/23
1995-'96 [1] 21/9
1996 [5] 19/2 21/13 21/25 22/5 23/25
1:47 [1] 1/18

2

20 [2] 5/1 19/2
2000 [4] 19/17 19/24 20/3 20/9
2017 [3] 1/18 3/1 24/18
213-443-3000 [1] 2/18
213-488-7100 [1] 2/10
213-894-1782 [1] 1/24

24 [1] 1/19

2543 [1] 2/17

28 [1] 24/11

2800 [1] 2/9

29 [1] 16/5

3

3000 [1] 2/18

312 [1] 14/2

313 [1] 14/3

350 [1] 1/22

369 [1] 11/9

3797 [1] 2/5

4

401 [1] 2/4

4311 [1] 1/23

45 [1] 19/25

4565 [1] 1/23

4:29 [1] 3/1

4A [5] 4/12 13/3 13/10 15/3 15/9

4th [3] 11/4 22/18 23/14

5

50 [1] 10/11

512-580-9609 [1] 2/6

5406 [1] 2/10

7

7100 [1] 2/10

725 [1] 2/9

753 [1] 24/11

78701-3797 [1] 2/5

8

865 [1] 2/16

9

90012-4565 [1] 1/23

90017-2543 [1] 2/17

90017-5406 [1] 2/10

9609 [1] 2/6

A

AB [1] 1/9

able [1] 5/17

about [19] 3/13 3/16 4/10 4/14 4/22

5/14 8/7 9/22 10/16 11/16 11/19 12/4

18/4 18/8 18/23 21/13 21/14 23/3

23/12

above [1] 24/14

above-entitled [1] 24/14

acknowledge [1] 12/10

action [1] 7/18

actual [1] 17/13

actually [8] 7/2 7/5 12/21 13/20 16/17

17/3 17/16 19/18

addition [1] 8/25

after [3] 11/20 18/17 20/23

afternoon [1] 3/6

again [7] 17/19 17/22 18/1 20/11 20/20

21/20 24/1

agree [1] 12/8

agreement [26]

AJW [1] 1/9

alive [1] 5/9

all [10] 3/4 3/16 4/7 4/14 9/3 10/16

16/19 21/13 22/15 24/3

allow [1] 15/8

almost [2] 9/4 10/11

along [1] 20/1

already [3] 3/7 12/23 12/25

also [30]

American [1] 14/18

amount [2] 4/23 8/14

ANDRÉ [1] 1/4

Angeles [5] 1/17 1/23 2/10 2/17 3/1

any [3] 12/22 13/5 22/7

anything [1] 19/1

apology [1] 23/25

APPEARANCES [1] 2/1

Apple [2] 3/21 3/22

appreciate [1] 24/2

approached [1] 21/7

are [17] 4/7 4/11 4/15 4/19 5/12 8/16

12/4 12/5 12/18 13/13 14/1 14/5 14/14

16/25 17/1 18/11 21/1

around [1] 12/25

as [19] 4/13 4/24 5/8 5/20 7/20 10/5

10/21 10/25 11/11 12/24 13/2 13/2

13/22 14/9 15/4 15/14 19/16 20/14

22/1

Asia [1] 17/18

asked [2] 4/16 8/17

Association [1] 14/20

at [24] 2/4 2/8 2/8 2/14 2/15 2/15 2/16

4/22 7/5 9/6 9/10 10/6 10/14 11/9 12/2

12/11 15/25 16/5 16/6 20/10 21/12

21/25 21/25 23/15

attend [1] 7/2

attended [1] 7/7

ATTORNEY [7] 2/4 2/8 2/8 2/14 2/15

2/15 2/16

Austin [1] 2/5

authentic [10] 4/16 9/24 10/1 13/4

13/22 15/3 15/6 23/9 23/16 23/17

authorities [1] 13/22

autobiography [2] 8/2 8/3

autographs [2] 14/1 14/7

Avenue [1] 2/4

away [2] 5/8 16/9

B

back [14] 3/22 4/2 5/8 6/2 8/7 8/18 9/7

9/8 10/19 10/19 10/24 11/20 20/7

23/21

backed [1] 15/18

backyard [1] 21/6

bankruptcy [1] 9/19

based [1] 6/9

be [8] 3/7 4/16 12/6 13/2 15/16 15/23

17/13 21/4

became [3] 6/4 6/6 6/20

because [5] 12/7 13/12 15/19 19/1

21/2

become [1] 3/18

been [4] 3/6 4/24 4/25 10/11

before [4] 8/5 18/17 18/22 21/22

beginning [1] 21/17

behalf [1] 22/6

being [1] 5/15

believe [2] 12/16 14/6

between [6] 5/24 13/6 13/16 19/2 20/4

22/18

big [2] 5/14 8/4

BIROTTE [1] 1/4

B
bit [2] 9/22 12/3
blank [1] 12/24
Board [2] 9/16 17/22
both [4] 5/11 14/13 18/10 18/14
bottom [1] 10/6
boy [1] 12/1
brief [1] 3/7
built [1] 19/5
bumbling [1] 14/10
bunch [1] 12/15
Burin [1] 13/18
business [2] 8/17 10/10
but [13] 4/14 5/3 9/16 11/13 12/13
12/22 13/5 13/11 14/4 14/9 16/3 18/6
18/17
buyer's [2] 3/14 23/10

C
CALIF [1] 3/1
CALIFORNIA [6] 1/2 1/17 1/23 2/10
2/17 14/21
called [3] 6/14 6/16 13/17
calling [1] 11/8
came [3] 7/6 19/25 21/22
can [2] 3/23 19/19
can't [1] 14/12
capable [1] 14/6
case [7] 3/13 3/14 3/14 3/25 4/10 5/2
23/10
cases [1] 5/13
CENTRAL [1] 1/2
certain [1] 22/13
certificate [2] 14/16 24/8
certified [1] 14/18
certify [1] 24/10
character [3] 17/14 17/15 20/18
check [1] 12/25
CHIBIB [3] 1/15 2/3 3/3
chose [2] 16/12 16/22
circumstances [1] 8/9
claim [5] 12/13 13/13 13/19 14/4 14/5
claiming [3] 12/5 12/14 13/23
clarify [1] 22/12
classic [2] 3/14 23/10
close [4] 6/5 6/17 6/20 6/24
CM [1] 1/21
CO [2] 1/10 18/9
Code [1] 24/11
coincide [1] 17/1
come [1] 19/23
common [1] 17/17
companies [1] 10/21
company [7] 13/17 13/18 18/4 18/6
20/24 21/7 22/22
Computers [1] 3/21
conclude [1] 23/6
conclusion [2] 15/8 16/6
Conference [1] 24/16
confirm [1] 9/13
confirmed [1] 23/24
conformance [1] 24/15
confused [1] 17/24
Congress [1] 2/4
considerable [1] 23/8
considered [1] 6/3
consulting [1] 6/12

contemplated [1] 8/5
contract [26]
contracts [2] 10/17 14/7
convincing [1] 4/18
Copyright [2] 20/6 20/10
corporate [2] 10/4 10/15
corporation [3] 1/6 1/6 1/10
correct [1] 24/12
cost [1] 7/17
could [8] 3/24 8/18 9/7 9/10 9/21
16/21 18/25 22/25
COUNSEL [3] 2/1 3/4 24/3
Counterclaimant [2] 1/11 2/13
Counterdefendant [2] 1/7 2/2
countries [1] 17/18
course [1] 6/22
COURT [1] 1/1
Courthouse [1] 1/22
courtroom [2] 11/18 15/16
courts [1] 14/21
create [1] 19/6
created [3] 3/10 16/17 17/20
creators [1] 5/21
Criminal [1] 14/17
Crocodile [1] 6/14
CRR [1] 1/21
CRR-CM [1] 1/21
CSR [3] 1/21 24/10 24/24
CUNEO [4] 1/21 24/10 24/23 24/24
Cunningham [5] 15/15 15/17 15/20
15/21 16/4
customs [2] 10/10 10/18
CV [1] 1/9

D
Daisuke [1] 9/14
Daisuke Oto [1] 9/14
DANIEL [1] 2/15
danposner [1] 2/18
Date [1] 24/18
day [3] 1/19 3/6 23/6
deal [6] 3/24 4/8 4/20 5/14 10/16 23/11
debt [5] 4/5 4/5 4/22 8/4 9/11
debts [1] 9/7
decide [1] 14/23
decision [1] 15/1
decline [2] 7/19 7/23
Defendant [2] 1/11 2/13
degree [1] 10/12
demonstrate [1] 17/9
deposition [2] 15/15 16/9
desperate [3] 3/17 4/20 23/20
did [8] 9/10 9/15 19/13 20/21 20/21
20/21 21/21 22/9
didn't [5] 9/8 11/14 18/6 18/19 19/1
director [1] 5/20
Directors [2] 9/16 17/23
display [1] 3/9
displayed [10] 4/9 5/5 5/22 6/10 7/3
11/6 13/14 13/24 19/11 22/3
dispute [1] 3/10
distributing [1] 20/25
distribution [2] 20/8 21/5
DISTRICT [2] 1/1 1/2
division [2] 1/3 21/20
do [2] 14/23 19/1
document [17] 4/14 9/23 12/14 13/15
13/21 13/25 14/1 14/20 16/15 16/18

18/13 18/18 20/6 20/8 21/10 21/23
23/16
documents [12] 7/13 7/22 8/12 8/16
9/3 9/25 13/8 16/2 16/11 16/25 17/9
19/12
doesn't [1] 14/12
doing [1] 20/11
don't [3] 11/12 18/1 21/8
done [2] 18/10 18/17
downturn [1] 7/16
draw [1] 16/16
during [5] 3/17 7/25 19/13 20/11 20/14

E
earlier [2] 15/19 18/25
early [3] 4/2 6/2 23/22
East [1] 14/17
Easy [1] 13/13
economy [1] 7/17
education [1] 15/1
effects [1] 5/20
Eiji [9] 5/19 5/19 5/23 6/2 6/3 6/9 6/13
6/19 21/18
Eiji Tsuburaya [6] 5/19 5/19 6/2 6/3
6/19 21/18
Eiji's [1] 22/2
either [1] 12/19
Ejiri [5] 10/9 10/9 10/11 10/14 11/1
elaborate [1] 12/17
Eleven [1] 19/9
EMANUEL [1] 2/14
employee [2] 16/8 21/16
end [2] 23/6 24/4
engineer [1] 14/18
English [3] 16/21 16/22 16/23
enormous [2] 4/23 21/4
enter [2] 16/22 18/5
entered [3] 11/5 16/17 18/2
Enterprise [3] 12/21 18/9 22/18
Enterprises [5] 10/1 10/5 13/4 15/6
18/12
entire [1] 19/5
entities [3] 18/11 18/11 18/14
entitled [1] 24/14
episodes [1] 14/11
equivalent [1] 8/8
even [1] 13/19
evidence [19] 3/25 4/18 4/19 5/3 6/15
6/23 7/13 7/24 8/1 9/6 9/24 10/4 13/3
13/20 16/19 19/3 19/18 23/8 23/23
evidencing [1] 19/13
exact [1] 15/20
exactly [1] 12/4
examination [1] 16/13
Examiners [1] 14/20
example [2] 17/5 17/5
exchange [3] 4/6 4/21 9/11
exclusive [1] 22/13
executed [1] 22/17
exercise [1] 19/1
exhibit [16] 4/9 4/12 11/6 11/9 13/3
13/10 13/14 13/16 13/21 14/2 14/3
15/3 15/9 19/11 22/3 22/5
Exhibit 129 [2] 13/16 13/21
Exhibit 144 [1] 22/5
Exhibit 312 [1] 14/2
Exhibit 313 [1] 14/3
Exhibit 369 [1] 11/9

15/9
experience [1] 14/25
expert [5] 10/9 10/25 14/15 15/10
15/12
exploit [1] 22/13

F

fact [2] 9/13 10/24
fake [2] 12/7 13/2
family [2] 6/5 6/25
family's [1] 7/6
famous [5] 5/20 6/7 6/13 17/15 20/17
fantastic [1] 20/16
father's [1] 12/2
federal [1] 20/10
few [1] 8/13
Figueroa [2] 2/9 2/16
filed [2] 20/6 20/9
film [6] 13/18 14/11 19/17 19/20 19/20
19/22
filmmaker [1] 5/20
films [11] 3/11 4/11 6/7 6/8 6/8 6/14
6/16 8/17 8/18 8/23 9/1
financial [4] 4/1 7/14 12/10 23/21
firm [1] 10/15
first [8] 1/22 1/22 8/16 13/15 16/19
19/4 22/11 23/14
Floor [1] 2/17
footage [2] 19/25 20/1
foregoing [1] 24/12
foreign [1] 11/11
forged [3] 12/13 12/13 12/19
forgeries [1] 12/15
forgery [6] 12/17 13/13 13/19 13/23
14/5 23/19
forging [1] 14/7
forgive [2] 4/5 9/11
forgiveness [1] 4/22
format [1] 24/14
former [3] 11/3 17/22 21/16
founded [1] 5/18
founders [1] 3/21
frail [1] 5/17
friend [3] 8/10 9/18 9/20
friends [1] 5/4
full [1] 3/9

G

gave [3] 5/11 8/17 9/18
gentleman [1] 16/8
genuine [1] 4/17
get [7] 8/1 13/16 14/23 15/1 16/16
18/14 20/16
getting [1] 14/10
Giant [3] 6/16 17/6 17/7
glaring [1] 18/24
gmail.com [1] 1/24
go [2] 3/24 23/3
Godzilla [2] 5/21 5/25
going [88]
GOLDSTEIN [1] 2/15
good [2] 3/6 5/4
got [3] 9/10 12/24 22/21
government [1] 20/10
graduate [2] 14/16 14/17
grandfather [1] 5/19

great [1] 8/4
Guide [1] 20/2
guy [1] 14/10

H

had [5] 9/4 11/15 18/14 18/18 19/1
hand [1] 14/6
hands [1] 12/24
hanko [15] 10/4 10/5 10/6 10/17 10/18
10/21 10/24 12/20 12/23 14/7 15/5
15/6 15/11 23/17 23/18
Hanuman [8] 7/7 17/13 17/14 17/16
17/16 17/17 19/9 20/1
happened [1] 20/19
happening [1] 18/7
Haruman [2] 17/10 17/17
Harvard [1] 10/13
has [6] 4/24 10/11 14/16 14/25 15/1
16/8
have [14] 3/20 9/8 11/12 11/15 12/16
16/3 16/4 18/19 18/25 21/7 21/8 21/10
22/10 22/12
having [1] 23/21
he [57]
he'll [1] 15/16
he's [17] 5/15 5/21 8/3 10/16 10/20
11/19 14/18 14/19 14/20 15/5 15/6
15/24 16/3 19/23 19/23 22/1 22/1
head [1] 21/20
hear [49]
heard [16] 3/8 3/16 3/20 4/24 5/8 5/18
5/21 11/7 12/3 14/9 15/14 15/17 16/14
18/4 18/25 21/12
heavy [1] 7/16
held [2] 12/1 24/13
help [2] 8/15 10/8
here [12] 3/10 4/15 5/15 5/15 5/23
5/24 11/18 14/2 15/16 18/7 19/9 21/24
here's [2] 19/13 22/16
hereby [1] 24/10
high [1] 7/17
him [5] 6/3 9/18 9/18 9/20 21/21
his [22] 3/22 4/5 5/16 6/3 6/7 6/19 6/20
7/10 8/10 8/23 9/18 9/20 11/3 12/2
12/24 14/24 16/6 16/9 18/6 19/6 21/6
22/25
holding [1] 7/9
Hollyn [1] 19/23
home [1] 22/15
Honor [1] 3/5
HONORABLE [1] 1/4
house [3] 7/5 7/6 12/2
how [4] 6/24 14/25 14/25 16/5

I

I'm [2] 4/4 21/11
if [2] 3/24 12/24
imagine [2] 3/23 10/21
implausible [1] 13/2
implication [1] 16/15
important [1] 22/16
importantly [1] 20/5
impossible [3] 15/21 15/24 16/6
include [2] 22/15 22/15
including [1] 22/13

J

Jambo [3] 6/16 17/6 17/7
Jamborg [1] 22/14
Japan [7] 8/19 10/15 10/17 10/19 11/3
16/20 23/14
Japanese [6] 1/6 1/10 7/17 8/8 10/9
10/20
JEFFREY [1] 2/8
jeffrey.wexler [1] 2/11
Jimmy [2] 16/8 21/20
Jimmy Ugawa [1] 21/20
JOHN [1] 2/14
JR [1] 1/4
JUDGE [1] 1/4
Judicial [1] 24/15
Jury [1] 1/19
just [6] 6/24 12/22 12/25 22/7 22/11
23/10
Justice [1] 14/17

K

Kazuo [2] 21/24 22/5
Kazuo's [1] 5/18
kept [3] 10/21 10/24 12/23
King [1] 5/24
Kiyoshi [1] 21/16
knew [4] 11/19 17/15 21/13 21/14
know [2] 3/6 18/6
known [1] 7/18
Kong [1] 5/25

L

largest [1] 10/14
late [1] 16/10
later [1] 3/18
law [12] 2/4 2/8 2/8 2/14 2/15 2/15
2/16 10/10 10/11 10/12 10/15 10/15
laying [1] 12/25
learned [1] 6/9
left [1] 5/23
legally [1] 18/13
legitimate [1] 22/9
lengths [2] 3/23 4/8
less [3] 16/16 17/4 18/1
let [3] 9/14 23/6 23/6
let's [2] 9/22 16/23
letter [11] 22/5 22/7 22/7 22/8 22/12
22/20 22/20 22/24 23/2 23/2 23/25
letterhead [13] 10/2 12/19 12/22 12/22
12/22 13/4 13/5 13/5 14/8 15/3 15/3
15/11 23/17

L
license [2] 8/20 22/17
licensed [2] 8/18 20/18
licensing [1] 20/13
light [1] 8/9
like [2] 13/9 13/12
likely [6] 16/17 17/3 17/4 17/19 18/1 18/2
listed [1] 4/11
listings [1] 20/2
literally [1] 16/10
litigation [3] 4/25 5/2 5/11
little [2] 9/22 12/3
live [1] 7/18
live-action [1] 7/18
lived [1] 21/2
living [1] 5/9
Lloyd [1] 15/15
Lloyd Cunningham [1] 15/15
LLP [3] 2/3 2/7 2/14
loaned [1] 8/21
long [2] 3/6 20/23
longtime [1] 8/10
look [3] 13/9 13/12 22/11
looked [3] 15/25 16/5 16/5
looking [2] 11/9 21/5
Los [5] 1/17 1/23 2/10 2/17 3/1
losses [3] 7/16 7/25 8/4
lot [5] 9/18 9/25 11/7 13/9 22/4
LTD [2] 1/10 18/9

M
made [20] 3/11 3/11 4/3 4/4 4/20 5/4 5/14 6/8 6/15 6/17 6/17 7/12 10/16 15/18 17/3 17/16 17/18 18/17 19/8 19/25
make [14] 8/17 11/13 14/13 15/1 16/6 16/16 17/3 18/1 18/2 18/13 18/14 19/6 19/19 23/15
makes [2] 14/10 21/2
making [3] 6/7 7/20 17/19
man [2] 6/22 21/3
many [3] 16/5 20/22 20/22
March [3] 11/4 22/18 23/14
March 4th [3] 11/4 22/18 23/14
mastermind [1] 12/17
matter [1] 24/14
may [3] 3/4 3/20 13/2
maybe [5] 3/17 7/25 15/19 18/24 20/5
me [3] 9/14 23/6 23/6
mean [2] 10/17 10/17
means [1] 21/4
media [1] 22/15
member [2] 14/19 17/22
men [1] 16/20
mentor [1] 6/4
MICHAEL [1] 2/3
michael.chibib [1] 2/6
mid [5] 4/2 7/15 10/19 10/25 23/22
mid-'70s [3] 10/19 10/25 23/22
mid-1970s [2] 4/2 7/15
middle [3] 5/7 5/24 7/9
Mike [2] 14/15 14/15
Mike Wakshull [1] 14/15
million [1] 8/8
millions [1] 19/6
minutes [1] 19/25

mistake [2] 11/13 17/18
mistakes [9] 14/10 15/19 16/15 16/16 16/25 17/1 17/2 17/3 18/1
money [7] 4/23 8/14 9/5 9/8 9/8 9/18 19/6
monster [3] 6/8 7/19 7/19
monster-type [1] 6/8
more [6] 3/14 3/18 17/3 17/19 18/2 20/5
Moriaki [1] 11/18
most [3] 6/13 7/25 18/24
mounting [1] 7/25
movie [10] 6/17 7/2 7/7 17/16 19/5 19/9 19/14 19/14 19/15 20/3
movies [2] 7/19 19/7
MR [7] 1/15 3/3 7/7 14/16 17/8 19/13 20/24
Mr. [139]
Mr. Cunningham [4] 15/17 15/20 15/21 16/4
Mr. Eiji [2] 5/23 6/9
Mr. Eiji Tsuburaya [1] 6/13
Mr. Eiji's [1] 22/2
Mr. Ejiri [4] 10/9 10/11 10/14 11/1
Mr. Kazuo [1] 22/5
Mr. Kazuo Tsuburaya [1] 21/24
Mr. Kazuo's [1] 5/18
Mr. Kiyoshi Suzuki [1] 21/16
Mr. Moriaki Uematsu [1] 11/18
Mr. Noboru [19] 5/8 6/21 7/1 7/5 7/9 8/10 8/13 8/25 9/10 9/17 9/20 12/8 16/17 17/3 17/19 17/24 18/2 18/5 19/18
Mr. Noboru Tsuburaya [5] 5/6 6/21 10/7 14/2 15/8
Mr. Noboru's [3] 13/9 17/2 22/1
Mr. Oto [6] 9/15 9/15 9/17 9/19 17/22 17/23
Mr. Quinn [14] 3/8 4/25 5/14 11/7 12/3 14/9 15/14 15/17 16/15 18/5 19/12 20/20 21/12 22/1
Mr. Sompote [54]
Mr. Sompote Saengduenchai [1] 22/19
Mr. Sompote's [7] 5/12 6/13 6/25 9/1 9/2 9/5 13/17
Mr. Suzuki [2] 21/16 21/19
Mr. Takashi [1] 10/9
Mr. Uematsu [2] 11/18 11/22
Mr. Ugawa [1] 16/12
Mr. Wakshull [3] 14/23 15/2 15/18
Mr. Wakshull's [1] 15/11
Mr. Wayne [3] 3/21 3/23 4/1
much [5] 3/18 6/3 14/25 14/25 24/1
music [2] 20/17 20/19

N
name [5] 16/8 17/24 18/4 18/6 19/16
National [1] 14/19
neat [1] 3/8
need [2] 21/8 21/11
negatives [2] 19/19 19/20
neither [1] 16/21
never [2] 12/8 18/5
next [2] 7/11 8/13
no [10] 1/9 3/10 10/25 11/13 15/10 18/25 19/12 21/12 21/13 24/24
Noboru [26]

Noboru Tsuburaya [2] 8/2 16/12
Noboru's [3] 13/9 17/2 22/1
none [1] 12/9
Norman [1] 19/23
Norman Hollyn [1] 19/23
not [21] 5/15 5/15 5/17 9/7 9/15 11/15 12/13 12/22 13/5 14/24 17/8 17/14 17/18 18/7 18/20 20/23 21/21 22/21 22/21 23/4 23/18
notably [1] 8/1
nothing [3] 20/11 20/21 20/21
November [3] 1/18 3/1 24/18
now [9] 4/7 5/18 9/14 9/22 11/17 13/22 16/14 20/23 23/3
number [1] 14/11

O
off [1] 15/18
offer [2] 15/10 15/12
offers [1] 10/25
office [3] 13/1 20/7 20/10
offices [2] 11/4 23/15
official [5] 1/21 10/4 12/21 13/4 24/24
oftentimes [1] 17/24
old [1] 5/17
on [38]
one [10] 3/21 5/21 6/13 6/16 9/23 14/6 16/20 16/20 21/12 21/14
one-page [1] 9/23
only [8] 3/17 9/10 9/15 12/13 13/5 15/12 16/4 22/21
oOo [2] 3/2 24/6
OPENING [2] 1/15 3/3
opinion [1] 15/11
opinions [1] 15/18
opposite [2] 15/20 19/4
or [14] 3/14 4/14 6/4 7/19 11/8 12/20 12/20 14/11 14/24 15/11 16/21 17/2 17/17 21/11
order [3] 16/6 18/10 18/13
original [8] 11/10 11/12 11/13 11/15 11/15 11/23 12/1 18/18
other [8] 5/11 6/16 12/15 13/8 16/2 17/18 22/21 22/24
Oto [7] 9/14 9/15 9/15 9/17 9/19 17/22 17/23
Our [1] 13/3
out [2] 14/12 21/4
over [5] 4/25 8/13 8/19 8/22 8/25
overseas [2] 4/21 21/21
owed [2] 4/5 9/7
own [8] 6/7 7/21 7/22 8/23 10/23 16/7 19/6 21/21
owned [1] 3/16

P
P.M [2] 1/18 3/1
page [4] 1/19 9/23 10/6 24/14
paper [2] 11/9 11/14
paragraph [1] 22/12
parties [1] 5/12
partner [1] 10/14
passed [2] 5/8 16/9
PAT [4] 1/21 24/10 24/23 24/24
patcuneo1600 [1] 1/24
pay [2] 9/7 9/8
people [3] 17/18 22/25 23/3
percent [1] 3/22

P
 perfectly [1] 13/7
 period [5] 13/6 20/12 20/15 20/20 22/16
 permission [1] 9/2
 person [4] 15/22 15/23 15/25 16/1
 Pete [6] 5/16 6/25 7/9 11/25 20/12 22/23
 Pete's [2] 7/4 11/25
 phase [1] 18/8
 photo [1] 5/24
 photocopy [3] 11/8 11/8 11/14
 photograph [6] 5/5 5/22 6/10 7/3 11/10 13/24
 photographs [2] 14/2 16/1
 photos [1] 14/7
 piece [3] 11/8 11/14 12/21
 PILLSBURY [2] 2/3 2/7
 pillsburylaw.com [3] 2/6 2/11 2/11
 PITTMAN [2] 2/3 2/7
 Plaintiff [2] 1/7 2/2
 pop [1] 20/17
 POSNER [1] 2/15
 poster [1] 19/14
 Potentially [1] 15/16
 practicing [2] 10/11 10/15
 premier [1] 7/7
 presented [1] 21/10
 president [1] 21/25
 PRESIDING [1] 1/4
 previous [3] 5/2 5/10 5/13
 problem [1] 7/14
 problems [1] 12/10
 proceed [1] 3/4
 proceedings [4] 5/11 11/11 24/4 24/13
 proceeds [1] 8/22
 processers [1] 18/20
 Prod [2] 18/8 18/21
 producing [1] 7/17
 PRODUCTIONS [3] 1/10 13/17 18/12
 professor [1] 19/22
 properties [1] 22/13
 prove [1] 9/24
 provide [4] 11/14 14/14 16/12 18/16
 provided [3] 13/21 15/8 19/19
 pursuant [2] 22/17 24/11

Q

qualified [1] 14/24
 quality [2] 14/18 14/19
 question [1] 4/15
 QUINN [16] 2/14 2/14 3/8 4/25 5/14 11/7 12/3 14/9 15/14 15/17 16/15 18/5 19/12 20/20 21/12 22/1
 quinnemanuel.com [3] 2/18 2/19 2/19
 quite [2] 6/6 19/3

R

RAWSON [1] 2/8
 realized [1] 15/19
 really [4] 4/20 14/12 14/12 23/21
 reasons [1] 5/15
 rebut [2] 11/1 15/11
 received [2] 8/14 10/12
 reclaim [1] 22/25
 refer [1] 18/10
 reference [1] 16/14
 referencing [1] 17/6

referred [1] 4/13
 referring [1] 17/11
 regret [1] 3/19
 regulations [1] 24/15
 related [1] 20/8
 relationship [2] 6/18 6/19
 released [2] 19/14 19/15
 rely [2] 5/12 15/14
 remember [3] 8/7 17/22 18/20
 remorse [3] 3/14 3/15 23/10
 reneged [1] 23/5
 reported [1] 24/13
 Reporter [2] 1/21 24/24
 REPORTER'S [1] 1/15
 reputation [1] 23/1
 requested [1] 24/4
 resolve [1] 4/16
 rest [1] 14/21
 revenues [1] 7/22
 reviewed [1] 15/22
 right [10] 3/4 5/8 6/7 6/12 7/9 8/5 10/6 19/9 20/20 24/3
 rights [15] 4/6 4/10 4/21 8/20 9/11 19/1 19/2 20/9 20/18 21/8 21/8 21/10 21/21 22/10 22/13
 Ronald [1] 3/20
 room [2] 1/23 18/19
 RYAN [1] 2/15
 ryangoldstein [1] 2/19

S

Saengduenchai [3] 5/7 5/16 22/19
 said [6] 18/5 19/12 21/7 21/10 22/1 23/3
 same [5] 4/15 14/10 15/23 19/17 20/20
 samples [1] 16/5
 save [1] 8/15
 saved [1] 9/19
 saw [6] 3/8 3/9 11/23 19/21 20/24 21/6
 say [9] 10/23 12/12 12/19 13/1 14/9 15/17 17/23 21/12 23/4
 saying [3] 12/4 13/1 20/21
 says [1] 22/11
 scene [1] 7/11
 scheme [1] 12/17
 SCHENKKAN [1] 2/16
 School [1] 14/17
 screen [10] 4/9 5/5 5/22 6/10 7/3 11/6 13/14 13/24 19/11 22/3
 seal [10] 10/4 10/5 10/6 12/20 12/23 15/5 15/6 15/12 23/17 23/18
 seals [5] 10/17 10/18 10/21 10/24 14/7
 second [3] 8/21 13/25 19/8
 secondly [1] 16/24
 Section [3] 4/11 17/10 24/11
 Section 1 [1] 4/11
 secure [2] 10/22 10/24
 securely [1] 12/23
 see [18] 6/15 6/23 7/13 7/22 8/1 8/12 9/25 10/3 13/8 13/16 14/1 17/5 17/9 17/17 19/18 20/2 20/5 22/4
 seller's [1] 3/15
 selling [4] 8/23 9/1 20/25 22/22
 senior [1] 10/14
 sense [1] 21/2
 sensei [1] 6/4
 series [4] 3/12 20/13 22/14 22/14
 serious [1] 4/1

set [1] 7/11
 sets [1] 7/2
 Seven [5] 7/8 17/10 17/24 17/25 20/1
 several [2] 7/13 14/20
 severe [1] 12/10
 SHAW [2] 2/3 2/7
 short [1] 13/6
 shortly [1] 11/20
 should [2] 12/4 17/13
 shoulders [1] 7/10
 show [23] 3/25 4/18 4/19 5/3 7/14 7/24 8/16 9/4 9/6 9/24 13/3 13/20 16/19 16/25 19/3 20/2 22/8 22/24 23/8 23/9 23/12 23/20 23/23
 showed [1] 16/2
 shown [5] 4/7 5/6 5/7 5/23 20/3
 shows [2] 7/18 7/20
 signature [10] 10/6 10/7 12/12 12/13 12/20 13/9 13/10 15/13 18/17 23/18
 signatures [6] 13/12 15/7 15/22 15/25 16/5 16/11
 signed [13] 6/22 8/6 11/20 12/25 15/9 15/22 15/23 15/25 16/1 18/22 22/6 22/20 23/2
 significant [2] 7/14 18/13
 similar [2] 4/1 6/7
 similarly [1] 14/3
 simply [1] 8/25
 singer [1] 20/17
 so [21] 3/8 6/3 8/4 8/4 8/9 8/18 9/7 11/13 12/3 14/5 16/9 16/23 17/2 17/17 17/19 18/1 18/8 18/18 18/21 19/19 22/25
 Society [1] 14/19
 sold [2] 3/17 3/22
 some [6] 3/8 5/1 12/17 15/18 16/14 16/14
 someone [1] 3/16
 something [1] 3/17
 Sompote [58]
 Sompote's [9] 5/12 6/13 6/25 7/5 7/7 9/1 9/2 9/5 13/17
 son [4] 5/16 6/20 6/25 22/1
 sorry [3] 4/4 17/5 23/4
 South [2] 2/9 2/16
 Space [4] 19/16 19/24 20/3 20/9
 speak [1] 16/21
 special [1] 5/20
 specifically [2] 3/15 13/6
 spent [1] 19/5
 spots [1] 18/22
 squeeze [1] 18/18
 stamped [1] 12/23
 start [1] 16/23
 State [1] 14/18
 STATEMENT [2] 1/15 3/3
 STATES [6] 1/1 14/22 19/16 20/6 24/11 24/16
 stations [1] 20/14
 stay [1] 7/5
 steep [1] 7/23
 stenographically [1] 24/13
 still [1] 5/9
 stock [1] 3/22
 stole [1] 12/21
 stop [2] 21/8 21/11
 stories [1] 3/16
 story [1] 3/20

S
Street [4] 1/22 1/22 2/9 2/16
studied [1] 6/1
studio [2] 19/5 19/6
studying [1] 6/9
subject [2] 4/24 4/25
submitted [1] 13/20
successful [1] 6/7
such [3] 6/16 13/15 21/4
sue [2] 21/11 22/21
suffering [1] 7/16
suicide [1] 8/5
Suite [2] 2/5 2/9
SULLIVAN [1] 2/14
sum [1] 23/6
surrounding [1] 10/18
Suzuki [3] 21/16 21/16 21/19
T
table [2] 3/9 21/25
Takashi [1] 10/9
taken [1] 11/10
talk [2] 9/22 12/4
talking [2] 4/14 18/8
television [1] 20/14
tell [14] 7/4 8/3 9/14 9/17 9/20 10/16
10/20 15/21 15/24 16/4 19/24 21/11
21/19 23/3
ten [1] 16/13
Tennessee [1] 14/17
terminology [2] 17/2 17/7
terms [2] 12/8 17/1
territories [1] 22/14
testified [1] 14/20
testify [10] 7/1 9/9 11/2 11/19 12/1
15/2 15/5 15/7 16/3 19/23
testimony [40]
Texas [1] 2/5
Thai [6] 13/18 13/21 17/14 20/17 21/7
22/22
Thai Burin [1] 13/18
Thailand [22] 5/9 6/8 7/1 7/6 8/11 9/18
9/21 11/11 11/22 12/2 16/20 17/12
17/15 17/19 19/14 19/15 20/14 20/25
21/3 21/3 22/15 22/25
than [1] 17/4
Thank [3] 3/5 24/1 24/3
that [184]
that's [6] 7/8 13/1 13/1 16/5 18/7 23/4
their [9] 4/21 7/5 7/22 7/22 7/24 9/16
10/24 12/18 23/25
them [10] 3/19 6/17 7/1 8/17 8/19 9/16
16/12 16/13 21/11 21/11
then [7] 5/10 8/18 14/9 16/24 17/21
20/16 21/9
there [21] 4/11 5/6 5/7 6/12 7/9 7/18
11/9 11/12 11/13 11/23 12/14 13/10
16/10 16/23 17/6 18/11 18/11 21/1
21/5 21/17 22/11
there's [4] 3/10 18/12 18/25 19/12
these [17] 4/8 8/9 12/8 13/8 13/12
13/13 14/2 14/5 16/16 16/20 16/25
17/1 17/2 19/1 21/7 21/8 21/10
they [41]
They'll [1] 12/16
they're [4] 12/14 13/1 13/22 14/4
thing [4] 3/18 9/10 12/5 18/24

things [4] 3/10 6/9 20/22 23/12
think [4] 3/23 12/4 12/7 18/24
third [2] 8/24 13/25
this [67]
those [10] 4/11 5/13 6/8 8/18 10/21
14/13 16/2 19/2 22/10 22/22
though [1] 13/19
thought [1] 6/3
thousands [1] 16/11
three [2] 16/2 23/12
through [2] 1/19 6/19
throughout [1] 14/21
tim.rawson [1] 2/11
time [11] 4/22 7/25 9/7 9/10 12/11 13/6
19/13 20/14 20/20 21/25 24/1
timed [1] 13/7
times [4] 3/17 4/19 14/21 23/21
TIMOTHY [1] 2/8
title [5] 14/11 17/6 17/9 17/13 24/11
today [4] 3/10 11/19 23/7 24/1
together [1] 14/13
Tokyo [1] 10/12
told [4] 9/3 9/17 9/20 21/21
too [2] 12/15 13/13
took [1] 8/25
tough [2] 4/20 23/21
toys [1] 3/9
TPC [37]
TPC's [8] 7/21 10/23 12/18 13/11 16/7
17/1 23/4 23/15
traded [1] 4/21
transcript [3] 1/15 24/12 24/14
travel [1] 5/17
traveled [2] 11/3 11/4
tremendous [1] 8/14
Trial [1] 1/19
tried [1] 16/16
trouble [1] 4/2
true [2] 23/4 24/12
try [1] 3/7
TSUBURAYA [33]
Tuesday [2] 1/18 3/1
turned [1] 8/10
TV [5] 3/12 7/18 7/19 20/2 20/13
two [4] 5/4 16/20 18/11 18/22
type [1] 6/8
typed [2] 18/18 18/21
typewriter [1] 18/21
U
U.S [2] 20/3 20/10
Uematsu [3] 11/18 11/18 11/22
Ugawa [3] 16/8 16/12 21/20
Ultra [1] 17/25
Ultraman [19] 3/9 3/11 4/21 7/8 9/21
17/10 17/24 19/7 19/9 19/10 19/20
19/25 20/1 20/13 20/18 20/25 21/5
21/22 22/14
UM [1] 1/6
under [2] 6/2 6/9
UNITED [6] 1/1 14/22 19/16 20/6 24/11
24/16
until [1] 21/13
unwind [4] 3/24 4/4 4/8 23/11
up [1] 23/6
URQUHART [1] 2/14
usage [1] 17/1
USC [1] 19/22

use [5] 8/19 9/21 10/18 13/6 20/19
used [2] 9/15 11/11
uses [1] 17/8
using [2] 18/20 18/21
V
validity [1] 23/24
valuable [1] 3/18
very [14] 3/8 5/4 5/20 6/4 6/4 6/20 6/20
7/23 10/21 10/24 12/23 16/21 16/22
24/1
video [4] 20/17 20/19 20/23 22/15
videos [1] 3/9
viewership [1] 7/19
visit [2] 7/1 7/6
visited [1] 11/22
visiting [1] 11/23
W
wait [1] 12/20
Wakshull [6] 14/15 14/15 14/16 14/23
15/2 15/18
Wakshull's [1] 15/11
want [1] 14/5
wants [1] 23/11
Warriors [4] 19/17 19/24 20/3 20/9
was [60]
wasn't [2] 20/11 21/3
watch [1] 20/16
way [2] 18/25 21/13
Wayne [4] 3/20 3/21 3/23 4/1
we [8] 4/18 11/12 12/4 14/14 20/21
23/8 23/9 23/12
we're [8] 4/14 4/19 9/23 18/8 18/20
18/21 23/20 23/23
We've [2] 3/16 23/5
weigh [1] 14/12
well [15] 5/19 7/20 10/5 10/25 11/9
12/9 15/20 16/19 16/21 16/22 17/7
19/3 20/14 21/15 21/22
went [2] 11/22 21/9
were [13] 7/16 7/18 7/20 7/23 7/25 8/4
10/18 12/10 13/24 15/19 16/10 16/20
23/21
WESTERN [1] 1/3
WEXLER [1] 2/8
what [12] 5/3 7/11 10/17 10/17 10/18
11/1 11/9 12/4 13/1 16/3 19/13 22/11
what's [1] 18/7
when [5] 4/19 7/6 7/12 10/16 12/1
where [3] 11/5 18/6 20/17
whether [1] 14/23
which [2] 4/22 11/10
while [2] 5/14 11/23
who [11] 3/16 3/20 6/22 9/14 14/10
15/22 15/25 16/1 16/8 16/22 17/15
whom [1] 16/21
why [2] 12/5 13/1
will [4] 3/7 5/16 9/24 18/16
WINTHROP [2] 2/3 2/7
within [1] 20/20
without [1] 9/2
witness [1] 13/11
witnesses [6] 7/13 7/22 10/23 12/18
12/18 23/4
word [1] 18/20
work [4] 9/15 9/16 14/13 18/14
worked [2] 21/3 21/17

W

works [2] 20/25 22/22
worth [1] 8/19
would [8] 3/24 7/1 7/2 7/5 10/21 12/8
18/5 21/4
write [1] 16/21
writing [1] 23/24
written [1] 10/1
wrong [3] 12/5 14/11 14/11
wrote [3] 22/5 22/20 23/2
www.patcuneo.com [1] 1/25

Y

years [4] 5/1 8/13 10/12 19/2
yen [1] 8/8
you [60]
you'll [25]
you're [40]
young [1] 7/9
your [3] 3/5 23/6 24/1

Z

ZACK [1] 2/16
zackschenkkan [1] 2/19
Zoffy [2] 19/20 19/25